

EXHIBIT D

Rudwin Ayala x31665

Subject: FW: Dr. Chris Lachapelle-Urgent Request for a Phone call/Life Care Questionnaire (re: Stephanie Wadsworth et al v. Walmart Inc et al_ MAT- 13320575)

From: Katy Baughman <Katy.Baughman@hsc.utah.edu>

Sent: Tuesday, August 27, 2024 4:26:31 PM

To: Rudwin Ayala x31665 <rayala@forthepeople.com>

Cc: Suzanne Lee (Risk Management) <Suzanne.Lee@hsc.utah.edu>; Tawni Anderson <Tawni.Anderson@hsc.utah.edu>

Subject: RE: Dr. Chris Lachapelle-Urgent Request for a Phone call/Life Care Questionnaire (re: Stephanie Wadsworth et al v. Walmart Inc et al_ MAT- 13320575)

Hello, Mr. Ayala -

Thank you for reaching out. I reached out your law firm last week in response to requests Dr. Chris Lachapelle has received to assist your life care planner with a questionnaire and to schedule a 30 minute phone call with you prior to his deposition.

Since Dr. LaChapelle is to be deposed as a fact witness in your case he will not be available to speak to you or anyone other than his attorney in preparation for his deposition. This is in order to ensure that he remains an impartial fact witness and doesn't receive any information that could influence his recollection or perspective of the facts either way. Hopefully you can understand the reason we must decline your request to speak with him before his deposition? (We would decline any requests from opposing counsel for the same reason.)

In regards to your other request that he speak with your expert life care planner, Dr. Ronald Snyder, we have declined that request for the same reason. All of the information regarding your client's care, treatment recommendations and decision-making processes are included in Dr. Lachapelle's clinic notes which are part of your client's UUH medical record. All remaining questions you have related to his care of your patient will need to be addressed in his deposition.

In an effort to allow Dr. Lachapelle and his staff to remain focused on patient care, we respectfully ask that you and your office do not contact Dr. Lachapelle or his office staff directly regarding this patient. When you are ready to schedule his deposition please have your office contact me to initiate the request and I will assist with coordinating, just as I did with Dr. Giavonni Lewis' deposition. As a reminder, our office is to be your sole point of contact for Dr. Lewis, Dr. Lachapelle and all UUH providers.

Please let me know if you have any questions? I've copied two of our attorneys in case you need to address any remaining questions or concerns related to this case?

Sincerely,

Katy Baughman

Administrative Office Specialist

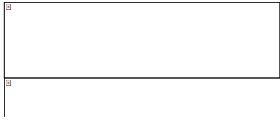
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